



In the Matter Of:

Anderson
v.
General Motors Corporation

C.A. # 05-877 JJF

Transcript of:

Roland C. Anderson

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<p style="text-align: right;">Page 105</p> <p>1 until whenever.</p> <p>2 Q. Sir, I'm going to ask you to go back to</p> <p>3 Exhibit 11 and show me or read off the names of everyone</p> <p>4 that has been hired on your list since 1999.</p> <p>5 A. It says here, from the list that they sent here,</p> <p>6 exhibit --</p> <p>7 Q. No. On your exhibit list of seniority, show</p> <p>8 me --</p> <p>9 A. It says A. K-A-B-L-E, he was hired on 12/28/81.</p> <p>10 Q. I said show me anyone that's been hired since</p> <p>11 1992.</p> <p>12 A. '92?</p> <p>13 Q. Yes.</p> <p>14 A. Okay. 1992. Dorothy --</p> <p>15 Q. What is her date of hire?</p> <p>16 A. Date of hire was 6/22/82.</p> <p>17 Q. I said after 1992.</p> <p>18 A. 1992. '82. This is what I'm reading from. See,</p> <p>19 they said they didn't hire nobody. According to</p> <p>20 deposition here, it says the last time we hired somebody</p> <p>21 since October '99. That's a lie. October '99, here we</p> <p>22 going into '81, '82, '83.</p> <p>23 Q. Isn't '81, '82, '83 before '99?</p> <p>24 A. It is after.</p>	<p style="text-align: right;">Page 107</p> <p>1 Q. We have now talked about the complaint, 05-877</p> <p>2 and the complaint 06-669. Have you filed any other</p> <p>3 complaints in this matter?</p> <p>4 A. No, those are the only two.</p> <p>5 Q. Do you have any other evidence of discrimination</p> <p>6 or retaliation we have not discussed?</p> <p>7 A. Well, like I said prior, and those priors can be</p> <p>8 brought back regardless of the statute of limitation,</p> <p>9 prior discrimination acts. And up until this point here,</p> <p>10 which is terminated, and temporary employee, which I said</p> <p>11 involved in my union benefits, which knocked me out of</p> <p>12 them, to be exact and prove I was an hourly worker</p> <p>13 instead of temporary worker.</p> <p>14 Q. Sir, have you asked the union to go back and</p> <p>15 investigate whether you should have been given some</p> <p>16 benefits?</p> <p>17 A. Another thing about the union --</p> <p>18 Q. I'm sorry.</p> <p>19 A. I'm going to explain to you.</p> <p>20 Q. Just yes or no?</p> <p>21 A. Yes.</p> <p>22 Q. What did the union determine?</p> <p>23 A. This is what they said. Let me explain. You ask</p> <p>24 me a question what did the union tell you. I'm going to</p>
<p style="text-align: right;">Page 106</p> <p>1 Q. It is.</p> <p>2 A. 1982, here, it says here October 1982, that's</p> <p>3 when the last time they hired person. Here we are</p> <p>4 talking about '82. After '99, sir. '99, '82. Okay.</p> <p>5 Eighties, not in the nineties.</p> <p>6 Q. Does the eighties come before or after the</p> <p>7 nineties?</p> <p>8 A. Eighties come before the nineties.</p> <p>9 Q. Okay. And I said: Was anyone hired after 1999?</p> <p>10 A. Well -- well, the issue here, sir, this is '82,</p> <p>11 1999, then '80, '82, this was after. After.</p> <p>12 Q. How is that after? If you were born in '82, are</p> <p>13 you younger or older than somebody born in '99?</p> <p>14 A. Okay. Okay. Okay. All right. They said they</p> <p>15 don't hire nobody since October 1999.</p> <p>16 Q. Do you have any evidence of anyone hired since</p> <p>17 1999?</p> <p>18 A. Well, they -- they wouldn't -- they haven't</p> <p>19 furnished me that.</p> <p>20 Q. So the answer is no?</p> <p>21 A. No, because the only thing I'm saying is that --</p> <p>22 I'm talking about this retaliation from the information</p> <p>23 that the judge said the allegation of retaliation.</p> <p>24 That's what we are here for.</p>	<p style="text-align: right;">Page 108</p> <p>1 tell you what they said.</p> <p>2 I'm trying to get things done through the</p> <p>3 union. They hang up the phone. They tell me to come up</p> <p>4 there. They give me a number. Listen. They give me a</p> <p>5 number to Mr. -- one of the chairman up there, I leave</p> <p>6 hundreds of messages up there. They never call, return.</p> <p>7 Send them a letter. Brought a letter up to the union</p> <p>8 hall. Showed them, like I told you earlier, to the civil</p> <p>9 rights person up there. They got a civil rights person</p> <p>10 up there, you know. I brought that information to them.</p> <p>11 I talked to the union president, Jackson, whoever his</p> <p>12 name is. He told me call the international union. I</p> <p>13 called the international union. Of course I did this. I</p> <p>14 called the international union.</p> <p>15 Now what they say? Somebody by the name of</p> <p>16 shop steward, you need to get in touch with him. I'm</p> <p>17 pretty sure she knows who he is. I leave messages for</p> <p>18 this guy. I ain't came here, prior or before this, and</p> <p>19 trying to get information. Technically speaking, this</p> <p>20 belongs to the union. I even asked them to file a</p> <p>21 grievance.</p> <p>22 I went to the NLRB and they carrying around</p> <p>23 from this, and then I'm not getting any justice, around</p> <p>24 the table here. Only way I could get relief or justice</p>

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<p style="text-align: right;">Page 109</p> <p>1 is bring it to the courts. I can explain my situation. 2 I was an hourly worker, I was a -- I was not a temporary 3 like they are giving this false information. 4 Q. Sir, you brought similar allegations in 2002, 5 2003, didn't you? 6 A. Not, not for retaliation. That's -- 7 Q. Sir, did you bring a lawsuit in 2002, 2003 8 alleging that you called the plant or that you went to 9 the plant and you weren't given an application? 10 A. Sir -- 11 Q. Yes or no? 12 A. Sir, as my recollection, I tried a lot of times 13 trying to get up there. Okay. I'm not lying to you. I 14 tried a lot of times, but the fact of it is -- 15 Q. Excuse me. 16 The question was: Did you file a lawsuit in 17 2002, 2003 alleging you asked for an application and they 18 refused to give you one? 19 A. I will continue doing it today and they keep on 20 turning -- yes. 21 Q. Yes, you filed that lawsuit? 22 A. Yes, but it wasn't pertaining to this 23 retaliation. 24 Q. Sir, you have to answer my questions.</p>	<p style="text-align: right;">Page 111</p> <p>1 get my medical records. I need my records one time for 2 my shoulder. They escorted me off with a guard. And I'm 3 entitled to it. 4 Q. Sir, you saw a doctor, didn't you? 5 A. I seen Dr. Johnson. 6 Q. And Dr. Johnson treated you for your shoulder? 7 A. Yes. 8 Q. Why can't you go get the records from 9 Dr. Johnson? 10 A. Dr. Johnson didn't have the records from General 11 Motors. 12 Q. Did you receive treatment at General Motors? 13 A. Yes, I did. I did. And the fact of it was they 14 have them records, they don't want to turn them over to 15 me. 16 Q. When did you receive treatment back in 1980 -- 17 A. That was back in the eighties somewhere. 18 Q. Sir, you talked about taking pain medication. 19 How often do you take pain medication? 20 A. I take it majority of the time when my back is 21 bothering me or shoulder is aching. And I got -- I got 22 pins in my jaw from a situation. And I got to take these 23 white pain pills. I have to numb the nerve and 24 everything. I've been taking them pretty often, Advil,</p>
<p style="text-align: right;">Page 110</p> <p>1 A. I'm answering. 2 Q. And that lawsuit was dismissed against you and 3 found that summary judgment was granted in favor of 4 General Motors, correct? 5 A. Sir, on the basis of the information that they 6 provided, which was false information which I can prove, 7 documentation I wasn't a temporary worker, hourly worker, 8 that's what they was talking about, that's why I was 9 denied. 10 But this retaliation, this is what we are 11 here for now, allegations of retaliation of my benefits. 12 Q. So you are only here on an allegation of 13 retaliation? 14 A. Well, for the basis of this. But I have a 15 statute where prior discrimination situations can be 16 reacted regardless, regardless of the time frame. I've 17 seen that. I have a copy of that document from Judge 18 Farnan had sent to me from the Third Circuit Court. I 19 can bring all these allegation back if it is a pattern of 20 discrimination. 21 Q. And the pattern of discrimination is that they 22 won't hire you? 23 A. Sir, they won't even let me call them on the 24 phone. I'm not even allowed to go on the property and</p>	<p style="text-align: right;">Page 112</p> <p>1 ibuprofen. The doctors prescribe the stuff for me. 2 Q. And so the pain pills that you are talking about 3 are Advil and ibuprofen. Anything else? 4 A. Oh, I take, like I said, Liperise. 5 Q. I'm talking for pain. 6 A. Oh, for pain. Ibuprofen and Advil and take 7 aspirin sometimes. 8 Q. Sir, you have been diagnosed as a schizophrenic, 9 correct? 10 A. Yes. 11 Q. And you were prescribed Prozac for that, correct? 12 A. Yes. 13 Q. When was the last time you took your Prozac? 14 A. I take it once in awhile when I get acting up. 15 Mainly -- see, I ain't supposed to accommodate all these 16 medicines. It makes me go off the rocket. I need my 17 medication now for sugar diabetes. I know my sugar is 18 probably up and it is probably causing me to act unnormal 19 because of this illness I have, you know. 20 So those are the one of the reasons the 21 doctor put me on this pain pills and all the other 22 medications. That's what the doctors were saying. 23 But I like to have the opportunity to do 24 something, drive cars or do something. But I'm not</p>

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<p style="text-align: right;">Page 113</p> <p>1 getting this opportunity, although I have my 90 days in.</p> <p>2 Q. And that was back in 1982 is what you are talking</p> <p>3 about?</p> <p>4 A. Yeah, but I still have my 90 days in. And they</p> <p>5 hired people during that time I was off on layoff in '82.</p> <p>6 Here is 6/22 after I was laid off. And I had four months</p> <p>7 seniority. And these are the names here, that Dougherty,</p> <p>8 O'Neal; 6/21, 6/22, Livingston, Needam, Tamone, whatever</p> <p>9 the name.</p> <p>10 Q. So you allege any allegations related to being</p> <p>11 called back or whatever are not part of this lawsuit you</p> <p>12 understand?</p> <p>13 A. Well, I just want you to be clear because you</p> <p>14 keep on bringing it back to October 1982, October 1999.</p> <p>15 I'm bringing it into the record because of the fact it</p> <p>16 was asked upon me earlier, earlier in the situation here.</p> <p>17 Now, again, I was telling you the only</p> <p>18 reason I'm here is the judge says the allegation of</p> <p>19 termination. These are the effects that's been taken</p> <p>20 over me all these many years. I've lived in pain and</p> <p>21 suffering. You know how people -- although you uppity,</p> <p>22 but the ones that you see every day, and going through</p> <p>23 this ordeal cycle and reality, it's hell. And this deals</p> <p>24 with your head. I want something, you know, they hire</p>	<p style="text-align: right;">Page 115</p> <p>1 certain age because of this? This is reflection of what</p> <p>2 they done to me. Do you understand me?</p> <p>3 And it deals with my head, sir. Yes, it</p> <p>4 does. Emotionally. Doctors will tell you. It will deal</p> <p>5 with your head, somebody do that to you. And put you</p> <p>6 down so you can't live that way. Not months. Years.</p> <p>7 Until you die. I shouldn't be living like that. I have</p> <p>8 rights like everybody else have rights.</p> <p>9 You dealing with these people up there. You</p> <p>10 go up and look at the ratio. I tell you, they ride</p> <p>11 around with confederate trucks, Maryland, Pennsylvania,</p> <p>12 go up there and sit and observe. See how many blacks</p> <p>13 come out. You can count them on your finger. You think</p> <p>14 that's justice? And I had my 90 days in, sir. I didn't</p> <p>15 do nothing to these people.</p> <p>16 Q. And the fact remains, you are receiving Social</p> <p>17 Security disability, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And you haven't been cleared from any doctors to</p> <p>20 go back to work?</p> <p>21 A. Well, fact of it is --</p> <p>22 Q. Yes or no?</p> <p>23 A. Listen. My doctor told me I can work part-time,</p> <p>24 Dr. Atkins, situation. And I have a doctor, medical</p>
<p style="text-align: right;">Page 114</p> <p>1 all their kind. You check the records.</p> <p>2 And now, as a matter of fact, on the record,</p> <p>3 I would like to have a copy of the status. If not, I get</p> <p>4 it from the Department of Labor. It prove something to</p> <p>5 you. There is a situation going over there which you</p> <p>6 don't understand or you do, you know it in the back of</p> <p>7 your head, you know. But evidence will prove it within</p> <p>8 itself.</p> <p>9 This situation just ain't going on in '82,</p> <p>10 sir. This is going on in society as we speak. That's</p> <p>11 everywhere. Jessie Jackson, everywhere, Al Sharpton, I'm</p> <p>12 going to give him a call tonight. I'm going to bring it</p> <p>13 to the forefront. I'm tired. I'm not going to live and</p> <p>14 die not hardly have nothing. Can't get nothing to get my</p> <p>15 stuff straightened out. This is Murder She Wrote, sir.</p> <p>16 Although you might not experience, you probably</p> <p>17 experienced it before you came.</p> <p>18 But the situation is -- reflects from '82.</p> <p>19 I'm frustrated. I have 90 days in, all the way up until</p> <p>20 now, and then I find this. Boom. It is a fire cracker.</p> <p>21 And then Fidelity, with the help of</p> <p>22 Fidelity, they are the one who told me. And this here</p> <p>23 shows that I was hourly worker, my pension. I don't know</p> <p>24 if I can get pension. What am I supposed to do at a</p>	<p style="text-align: right;">Page 116</p> <p>1 report for that. Okay.</p> <p>2 But that doesn't still extinguish the fact</p> <p>3 that these people can't turn around. And the subject we</p> <p>4 are even here for, as you said earlier, is retaliation</p> <p>5 and termination. That's what this is about.</p> <p>6 Q. How did that letter affect your ability to work</p> <p>7 at General Motors?</p> <p>8 A. It ain't the point of affecting the ability to</p> <p>9 work at General Motors. The point is, I lost my</p> <p>10 benefits. That's what I'm here for this.</p> <p>11 Q. What benefits?</p> <p>12 A. The union benefits, as this section stated from</p> <p>13 the courts, allegations, clearly states from General</p> <p>14 Motors, DOL, Department of Labor, says prestatements of</p> <p>15 allegation. Okay. Charging party employed which</p> <p>16 respondent has body shop production technician since 1982</p> <p>17 in Wilmington, Delaware. Charging party, protected</p> <p>18 class, retaliation. That's what we are here for.</p> <p>19 Q. Those are your allegations, correct?</p> <p>20 A. This is what the allegations that was discovered</p> <p>21 and put in case law with --</p> <p>22 Q. Let me see.</p> <p>23 A. -- the Department of Labor.</p> <p>24 Q. Sir, am I looking at this correctly when this</p>

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<p style="text-align: right;">Page 117</p> <p>1 says there was a charge of discrimination filed by Roland 2 Anderson on 2/14/06, correct? 3 A. That is the charge. 4 Q. Listen to me. 5 A. You didn't let me finish my statement. 6 Yes, that's a charge I filed, and in that, 7 in that episode of filing, an investigation from the DOL, 8 which is Department of Labor, this is what they 9 discovered, Deposition 5, which clearly states: 10 "Charging Party, Privacy Act. Dear Charging Party: 11 Please be advised that the information you have provided 12 comes under the provision of the Privacy Act of 1974." 13 These are the people who came up with that. 14 I told them about the charge. I'm not a lawyer. This is 15 what they discovered. Okay. 16 Q. They made no findings that said that anybody 17 discriminated against you, did they? Yes or no? 18 A. Sir -- 19 Q. Yes or no? 20 A. Letter me explain. 21 Q. You don't get to explain. You answer my question 22 and then you can explain. 23 A. No, and the reason why is that General Motors 24 gave them false information. This is the letter here,</p>	<p style="text-align: right;">Page 119</p> <p>1 page 2 -- he was not employed for 90 days as required 2 under the terms of the collective bargaining agreement. 3 Plaintiff was rehired on 25th, 1982, and was again laid 4 off October '82. Under certain agreements, certain 5 seniority rights, he acquired senior seniority rights. 6 I'm just saying they turn around and gave 7 this, 2005, 2008, stating I was a temporary employee and 8 terminated. 9 Q. Sir, can you name for me the person or persons at 10 General Motors that you allege discriminated against you 11 when they would not give you an application in 2005? Do 12 you have a -- 13 A. Sir, I told you earlier, they didn't give me 14 opportunity to get any conversation with these people. 15 They knew who I was. 16 Q. So the person you are alleging discriminated is 17 whoever answered the phone and told you they weren't 18 hiring? 19 A. No, sir. The complaint is dealing with General 20 Motors. They all conspired. 21 Q. What individuals at General Motors are you 22 alleging conspired against you? 23 A. Sir, the whole -- it's the corporation, the whole 24 facility. I'm saying from secretary all the way up to</p>
<p style="text-align: right;">Page 118</p> <p>1 what they got from the information. The responding 2 parties agree that employees during the period of 3 August 31 to 1981 to September 21st, '81, again, from 4 June to '82 to October the 1st, 1982, according to the 5 collective bargaining agreement you did not reach a 6 status of employment. This is the false information they 7 gave to them. 8 According to Dave Bull's information, it was 9 to the judge, way back then, before, never speaks about 10 terminated or temporary employee. This guy says here the 11 records of General Motors shows that plaintiff was 12 employed as an hourly worker from August the 31st to 13 September the 21st, 1981, when he was laid off. 14 False information you guys did. And that 15 guy, as I said earlier, the Disciplinary Counsel is 16 investigating it. Okay. And they are investigating. I 17 got to talk to them yesterday and actions will be taken. 18 It may be criminal actions or whatever actions, I'm going 19 to -- I'm going to talk to the DA, Attorney General's 20 Office because, to me, this is not fair. 21 This ruin my benefits and my life, sir. I 22 mean, it knocked me out the ballpark. And then it says 23 here when he was laid off, during the period of time he 24 acquired no seniority rights because he was not --</p>	<p style="text-align: right;">Page 120</p> <p>1 the management. 2 Q. Okay. And can you name any individual that you 3 believe discriminated against you or was part of this 4 plan to keep you out of the plant and told you that there 5 were no -- they weren't hiring in March of 2005, can you 6 give me the name of any person? 7 A. Sir, sir, sir, I'm here -- again, again, we are 8 here for the retaliation charge. Okay. Let's get that 9 clear, like you said earlier. We are here for this. 10 Okay. Whatever you are bringing up, that is irrelevant. 11 We are here, the judge ordered, for termination and 12 temporary, and what effects did it cause, that's what we 13 are here for. 14 Q. Sir, sir -- 15 A. The charge is -- 16 Q. So are you dismissing your lawsuit based on 17 05-877, which was marked as Deposition Exhibit 2? 18 A. No. The lawsuit clearly states what it says. 19 Q. Then I get to ask questions about that. 20 A. Okay, but don't say -- 21 Q. Sorry. You have to let me finish my question. 22 A. Yes, okay. 23 Q. What individual at General Motors are you 24 alleging retaliated against you in 2006 -- I'm sorry --</p>

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<p style="text-align: right;">Page 121</p> <p>1 in 2005?</p> <p>2 A. Sir, General Motors, period.</p> <p>3 Q. Can you name any individual?</p> <p>4 A. Sir, sir, this lawsuit says here, caption,</p> <p>5 plaintiff, Roland Anderson versus General Motors. That</p> <p>6 means the corporation. I hope you not missing anything.</p> <p>7 That means the corporation.</p> <p>8 That don't mean individual. They might be</p> <p>9 involved. All of them can be ruled a conspiracy. Do you</p> <p>10 know what conspiracy is? If everybody is in one room</p> <p>11 here, Room 71, one room here, they are conspiring against</p> <p>12 somebody. They all guilty. Even you. All of these.</p> <p>13 Whoever sent this in, all of them guilty, according to</p> <p>14 Attorney General, all of them.</p> <p>15 Q. The Attorney General told you that all these</p> <p>16 people --</p> <p>17 A. No, no, no. I had talked to them about other</p> <p>18 cases. And I'm going to talk to a lawyer I'm going to</p> <p>19 see this weekend, John Malik. They all involved in this.</p> <p>20 Not one individual, sir. You know that. You are a</p> <p>21 lawyer. It is called Rule 71, conspiracy, that's what</p> <p>22 that is.</p> <p>23 Q. So can you provide the name as we sit here today</p> <p>24 of any individual at General Motors, whether it is a</p>	<p style="text-align: right;">Page 123</p> <p>1 Q. Can you name --</p> <p>2 A. Wait a minute. Let me finish.</p> <p>3 Now, it only deals with me, and, like I</p> <p>4 said, I might, when this meeting is over with, I will</p> <p>5 subpoena informations and records, or I will get in</p> <p>6 contact with some of the employees from General Motors</p> <p>7 who have been affected. It might be a class action, I'm</p> <p>8 going to talk to a lawyer about, that we will look into</p> <p>9 hat. It is a good idea. We are going to look into it.</p> <p>10 Q. Can you name any employee that was treated</p> <p>11 differently in September of 2005 with regard to their</p> <p>12 layoff slash termination status?</p> <p>13 A. Sir, I wasn't even allowed to be on the premise</p> <p>14 to get any kind of information from these people.</p> <p>15 Q. So the answer is no?</p> <p>16 A. No, because of that reason, because, it is no.</p> <p>17 I'm willing to talk to you today, when the thing is over</p> <p>18 with, I'm going to get a subpoena, if I have to go to</p> <p>19 court, get it stamped and sealed, and send it to them. I</p> <p>20 want to know this myself. Of course, I'm glad you</p> <p>21 brought that up. That's a very good point. Because if</p> <p>22 so, it could be a class situation.</p> <p>23 Right now I'm dealing with myself. This is</p> <p>24 what came up. And that's all. That's what came up.</p>
<p style="text-align: right;">Page 122</p> <p>1 manager, supervisor, secretary, that you allege</p> <p>2 retaliated against you?</p> <p>3 A. Sir, they all, I mean all -- whoever is employed</p> <p>4 with General Motors, that's correct, all of them, from</p> <p>5 the secretary to the president. I don't care if he is in</p> <p>6 Detroit. Anywhere. This is what, the information that</p> <p>7 came back from the investigation, from the EEOC.</p> <p>8 Q. Can you provide the name of any employee that was</p> <p>9 treated differently than you were with regard to</p> <p>10 receiving applications in March of 2005?</p> <p>11 A. Sir, sir, yes, I can. And this is perfectly</p> <p>12 information here, that I had my seniority in, in 1982,</p> <p>13 and these here, all the people were hired you have after</p> <p>14 the time I was off.</p> <p>15 I was off June the 25th, and these people</p> <p>16 was hired during the time, 21, 22, 23, 24, 28. These</p> <p>17 people was hired and they didn't call me back.</p> <p>18 Q. Sir, my question was: Can you name any</p> <p>19 individual that was treated differently than you in March</p> <p>20 of 2005?</p> <p>21 A. Sir, March of 2005, it is clearly stating,</p> <p>22 pertaining to me, okay. This is the reason why the judge</p> <p>23 says we are coming here for allegations of termination</p> <p>24 and temporary employment.</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. Can you name any employee that was -- can you</p> <p>2 name any employee under the age of 40 that was treated</p> <p>3 differently with regard to either receiving an</p> <p>4 application in March of 2005 or with regard to the way</p> <p>5 they were listed, being either terminated or laid off?</p> <p>6 A. Again, we are here for this. You said it</p> <p>7 yourself. We are here for this termination and temporary</p> <p>8 situation. Nothing else. Okay. Nothing else. This is</p> <p>9 what the judge said. I have a copy in here. And you</p> <p>10 have to do a discovery dealing with this. It didn't say</p> <p>11 anything else. This is of retaliation. Okay.</p> <p>12 I'm going to answer your question.</p> <p>13 Q. Is that a no?</p> <p>14 A. Wait a minute. I'm going to answer your</p> <p>15 question. Without the documentation I can't say whether</p> <p>16 they was mistreated or not, until I get that information</p> <p>17 from the records department, personnel, which I'm going</p> <p>18 to do sometime this week. I will forward a subpoena for</p> <p>19 those records and that's the exact question.</p> <p>20 Q. Sir --</p> <p>21 A. And the answer is no, because of that reason.</p> <p>22 Q. Can you name any employee, manager or supervisor</p> <p>23 who were at General Motors that told you employees were</p> <p>24 being hired at General Motors in March or April of 2005?</p>

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<p style="text-align: right;">Page 125</p> <p>1 A. Sir, again, I couldn't even speak to anyone on 2 the phone about anything. I called to see if they were 3 doing any hiring. 4 Q. Have you physically been at the plant? 5 A. Yes. 6 Q. And went there -- 7 A. Go ahead. 8 Q. Sir, have you physically been on the premises of 9 the plant in either March of 2005 or April of 2005? 10 A. 2005, around them periods of time, I was there on 11 the plant, and the guard escorted me off and gave me a 12 union book. This is the book I received, the newer book. 13 This is the book I received during that period of time. 14 I went up there and got a book. It was kindly that the 15 guy gave it to me. He gave me this book here. Yes, I 16 went up there. 17 Q. When did he give you that book? 18 A. Around March of 2005 and April, around that 19 period of time. 20 Q. Okay. And according to you, you didn't 21 physically fill out an application? You called and they 22 told you they weren't hiring? 23 A. They did more than say they weren't hiring. She 24 said you were washed up and hung the phone up in my ear,</p>	<p style="text-align: right;">Page 127</p> <p>1 According to here, yes, people here working 2 during the time I was laid off, and 6/25, 6/28, these 3 people were called out during my time-for-time period and 4 they were whites. Okay. Check the records. They were 5 whites. 6 I didn't have the opportunity. They were 7 called. And I called and they said they weren't hiring. 8 And then I get this in 2005. That blew my Fidelity and 9 everything else. 10 Q. Sir, you hadn't had any Fidelity prior to that, 11 2005? 12 A. Well, but the fact of it is, sir, is they sent me 13 this information, in the course of confirmation, which 14 you didn't read, please contact us if you wish to make 15 transaction. 16 Evidently, I must have something in there. 17 And I'm saying like anybody, I'm curious. This is March 18 2005. Inquiring on your account, or ask questions 19 regarding this confirmation. Then I asked them. Oh, but 20 General Motors got you down as terminated. Terminated? 21 And then here, GM benefits center, my 22 pension. Hourly, it says here hourly-rated employee. I 23 was a hourly-rated employee. I ain't going to get that 24 probably because of this.</p>
<p style="text-align: right;">Page 126</p> <p>1 slammed it actually, said you were washed up, and I was 2 52-years-old, the records reflect. 3 (Discussion off the record.) 4 A. I think we -- can I say something? 5 Q. I'm almost done and then you can go on the record 6 and say whatever you feel appropriate. 7 How many lawsuits have you filed against 8 General Motors since 1982? 9 A. Well, I forget. I think it is about four or 10 five. 11 Q. Okay. How many administrative charges or other 12 charges have you filed against a union since 1982? 13 A. One or two. 14 Q. And have you been successful in establishing any 15 right to re-employment or benefits in any of those 16 previous charges, lawsuits or administrative hearings? 17 A. Sir -- 18 Q. Yes or no? 19 A. No. And I'm trying to say something to you, and 20 since you asked me a question and I answered it, the 21 answer is no, and the reason, like I stated, I have my 90 22 days in, they violated my rights. I had 90 days in. 23 They were supposed to call me back. They didn't call me 24 back.</p>	<p style="text-align: right;">Page 128</p> <p>1 They told me on the phone, "Mr. Anderson, 2 they got you down as temporary employee." 3 I said, "Didn't you receive the letter from 4 Dave Bull, from the records?" Clearly shows that I was 5 an hourly employee. The records, General Motors shows 6 that plaintiff was employed as an hourly worker from 7 August the 31st to September the 21st, 1981, when he was 8 again laid off. I'm going to take this to Attorney 9 General's Office. 10 Don't make sense. Then they turn around, 11 they turned around and retaliate because of whatever. 12 Q. What adverse employment action occurred to you 13 that forms the basis for retaliation? 14 A. I just told you. I was telling you for the 15 seventh time, sir, they invested my benefits. 16 Q. It wasn't anything to do with work? It was to do 17 with benefits, correct? 18 A. Well, you forgetting one thing. This false 19 information goes back for the five prior suits that I had 20 filed. It was false information given to them now. I'm 21 going to reopen it because this came in, and what Dave 22 Bull said, I didn't know this at first until this came 23 out. 24 I'm talking to a lawyer now. This is going</p>

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<p style="text-align: right;">Page 129</p> <p>1 to have to be reopened, reopened. Somebody gave false 2 information and can be reversible situation here. 3 Q. Sir, did you ever appeal any of the prior -- 4 A. Sir, I appealed the prior, but, like I said 5 earlier, 2005, this wasn't in the document. You 6 understand me? The only thing that was in the document, 7 which Dave Bull had said, okay, and now this pops up. 8 Oh, they got people gave false information here. 9 I was never terminated. I was never 10 temporary. That's why I probably lost my cases and 11 didn't get anywhere, sir. Of course, if I listed you as 12 terminated or temporary employee in which you have 13 documentation. 14 Q. Let's take a break. 15 A. I ain't finished. You asked me a question and 16 I'm going to answer it. The fact of it remains. Like 17 Larry Ramunno says, what it is is what it is. 18 Q. Do you have any lawyer representing you in this 19 case? 20 A. I'm going to talk to a lawyer and some other 21 people this week, like I said earlier. 22 Q. Who is the lawyer you are going to talk to this 23 week? 24 A. He -- I'm not at liberty to say yet. He hasn't</p>	<p style="text-align: right;">Page 131</p> <p>1 and complete discovery by October, whatever it is? 2 A. November the 8th. 3 Q. November the 8th? 4 A. Page 2. 5 Q. Okay. Sir, do you know that General Motors had 6 any kind of 401(k) or other plan back in 1982? 7 A. Yes, of course. 8 Q. That would be detailed in the contract? 9 A. Yes. 10 Q. Do you know how long you have to work at General 11 Motors to invest in any of their retirement or pension 12 plans? 13 A. It says here 30 days, according to this book 14 here, union contract book, it says here, "Unless 15 employees are at work on the 90th day of their 16 accumulated credited period, they must work another day 17 within their probationary period to acquire seniority. 18 If the 90th day of their accumulated credited period 19 falls on a holiday or an Independence Week Shutdown Day," 20 okay, say, "the employees will be considered as having 21 seniority as of the holiday or the Independence Week 22 Shutdown Day. If the 90th day of their accumulated 23 credited period falls on their vacation pay eligibility 24 date, the employees will be considered as having</p>
<p style="text-align: right;">Page 130</p> <p>1 been representing me, but I've been speaking to a couple 2 lawyers, Gary Aber and some other attorneys. I've been 3 speaking to them, not necessarily as representation, but 4 I'm going to set up an appointment with them. 5 MR. WILLIAMS: Let's take a two-minute break 6 and then I should be done. 7 (Recess taken.) 8 MR. WILLIAMS: For the record, I have marked 9 as Deposition Exhibit 1 a copy of a document. 10 THE WITNESS: That's hers. 11 BY MR. WILLIAMS: 12 Q. I understand, but I have to have you identify it. 13 Who is that document sent to, if you look at the "to" 14 line? 15 A. Roland Anderson. 16 Q. Who is it from? 17 A. Michael Williams. 18 Q. Do you recognize that fax number? 19 A. Yes, that's my fax number. 20 Q. And then that's also your phone number listed? 21 A. That's correct. 22 Q. If we turn to the second -- I'm sorry -- the 23 third page, is that a copy of the court order with regard 24 to this deposition and being able to go forward with it</p>	<p style="text-align: right;">Page 132</p> <p>1 seniority as the vacation pay eligibility date." 2 So it was 90 days according to page -- 3 Q. Okay. 4 A. Wait a minute. Let me finish. According to the 5 interpretations of paragraph (4) through (4c) and 6 paragraph 57. 7 Q. Okay. The question is: Do you know how long you 8 have to be employed at General Motors before you vest in 9 the retirement or pension plan? 10 A. According to this, you have to have 90 days in. 11 Q. And that's all you know. 12 A. Okay. 13 Q. That was the only question. At this time I have 14 no further -- in fact, let me see this document you are 15 referring to. 16 MS. GRAHAM: '96. 17 Q. Is there -- 18 A. Wait a minute. She is referring to the date of 19 1996. Those union books go back to 1992 -- I mean '82. 20 They don't change that much. 21 Now, if she is trying to refer to that -- 22 I'm glad she did mention that, because the fact of it is 23 they say books do not change. I talked to Wayne 24 University, that's '96, but the fact of it is those</p>

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<p style="text-align: right;">Page 133</p> <p>1 contracts don't change.</p> <p>2 Q. Sir, let me state, and then you can state</p> <p>3 whatever you want to --</p> <p>4 A. Go ahead.</p> <p>5 Q. -- for the purpose of this deposition, I'm going</p> <p>6 to submit to the court that this agreement was entered</p> <p>7 into on the 2nd day of November 1996 between General</p> <p>8 Motors, hereinafter known as the Corporation, and the</p> <p>9 International Union, United Automobile Aerospace and</p> <p>10 Agricultural Implement Workers of America, hereinafter</p> <p>11 referred to as the Union, and he was reading from</p> <p>12 Appendix D, which are the Rules For Computing Seniority</p> <p>13 of Employees who Acquire Seniority By Working 90 Days</p> <p>14 Within Six Continuous Months and Computing Periods in</p> <p>15 Paragraphs (4) through (4c) on page 182 and 183."</p> <p>16 A. Excuse me. Finish reading the bottom there, sir.</p> <p>17 I want you to read the entire situation, not only where</p> <p>18 it says accumulation of six months. It says down the</p> <p>19 bottom what I just read. Can I see that? Can I see my</p> <p>20 book, please?</p> <p>21 Q. Hold on. Let me finish and then you can do</p> <p>22 whatever you want to, read whatever you want to into the</p> <p>23 record.</p> <p>24 I'm just marking, instead of taking your</p>	<p style="text-align: right;">Page 135</p> <p>1 affective...shall become a member of the union within ten</p> <p>2 days after the 30th day by following the effective date</p> <p>3 of this agreement."</p> <p>4 So it doesn't make a difference, "following</p> <p>5 the effective date of this agreement," so if it was prior</p> <p>6 -- or within ten days after the 30th day following</p> <p>7 employment, which is later.</p> <p>8 "Remaining a member of the union, to the</p> <p>9 extent of paying initial fees and membership dues</p> <p>10 required as condition of acquiring, retaining membership</p> <p>11 in the union.</p> <p>12 "Whenever employee under and for the</p> <p>13 duration of this agreement," so it is from prior and the</p> <p>14 duration of this agreement, so it wouldn't make any</p> <p>15 difference.</p> <p>16 Okay. Let's see here. It says here,</p> <p>17 appendix D, "Unless employed or at work for the 90th day,</p> <p>18 they must work another day within their probationary</p> <p>19 period prior to acquiring seniority. If the 90th day of</p> <p>20 their accumulated credit period falls on a holiday or</p> <p>21 Independence Week Shutdown Day, the employees will be</p> <p>22 considered as having seniority as of the holiday or the</p> <p>23 Independence Week Shutdown" thing, "Shutdown Day. If the</p> <p>24 90th day of their accumulated credited period falls on</p>
<p style="text-align: right;">Page 134</p> <p>1 book, I'm reading to the court what it says on, what the</p> <p>2 pages are and what the agreement is.</p> <p>3 With that, I have no further questions. So,</p> <p>4 Mr. Anderson, to the extent you now have something you</p> <p>5 want to say on the record, you are free to do so.</p> <p>6 A. Yeah, okay. Let me emphasize on something here.</p> <p>7 This '96 book is the same book that they refer to</p> <p>8 exhibit -- what was that? Can I look at your exhibit?</p> <p>9 Q. You can look at whatever you like.</p> <p>10 A. It is Exhibit 4. It says here temporary and</p> <p>11 terminated employees. This is the same thing he read,</p> <p>12 but it says totally different than what this refers to.</p> <p>13 So that clarifies false documents came into the EEOC.</p> <p>14 Okay. Now, going back to what he just read,</p> <p>15 okay, Appendix D, "Rules For Computing Seniority of</p> <p>16 Employees Who Acquire Seniority By Working 90 Days Within</p> <p>17 Six Continuous Months," that means within six continuous</p> <p>18 months and computing the period specified in paragraph</p> <p>19 (4) and through paragraph (4c).</p> <p>20 Let's go to paragraph (4c), that's what it</p> <p>21 says about accumulation, an employee, (4a), "Employee who</p> <p>22 is not a member of the union at the time of this</p> <p>23 agreement," since he said it was '96, and I was in '82,</p> <p>24 it says here, "at the time of his agreement becomes</p>	<p style="text-align: right;">Page 136</p> <p>1 their vacation pay eligibility date, the employees will</p> <p>2 be considered having seniority as of the vacation pay</p> <p>3 eligibility date."</p> <p>4 By rights, it is 30 days, according to union</p> <p>5 seniority check-off, union membership dues on page 2.</p> <p>6 It is 30 days, effective the day of</p> <p>7 agreement. And this agreement is '96. Prior to any</p> <p>8 other agreements, it wouldn't make any difference</p> <p>9 according to this '96 one.</p> <p>10 After checking with Wayne University, they</p> <p>11 sent me a copy stating the fact there is no other books</p> <p>12 except for 1982 up until '96. Basically, it is the same</p> <p>13 thing in there. It is the same thing.</p> <p>14 So I would think that General Motors is in</p> <p>15 violation of these agreements.</p> <p>16 Okay. And it says here, article, Rule 67,</p> <p>17 "Employees will be laid off and rehired in accordance</p> <p>18 with the local seniority agreements." And as you see,</p> <p>19 General Motors hired people during the same I was laid</p> <p>20 off within the call-back period and they never called me</p> <p>21 back. That's further retaliation, all proof and</p> <p>22 documentations, if you want to use this as exhibit. I</p> <p>23 would like to have that entered as an exhibit, if it is</p> <p>24 okay with the attorney.</p>

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<p style="text-align: right;">Page 137</p> <p>1 Now, the question I asked her earlier --</p> <p>2 Q. Let me stop for record purposes. You want to</p> <p>3 have that entire agreement --</p> <p>4 A. Well, you have it. They -- I asked for a copy of</p> <p>5 the union book from the union hall. They said that --</p> <p>6 Q. Sir, I'm not arguing that point. I'm just asking</p> <p>7 you if you are asking her to take that whole book in as</p> <p>8 an exhibit, because I will tell you that she would then</p> <p>9 have to photocopy that entire book and attach it to the</p> <p>10 transcript which would --</p> <p>11 A. Well, I can prescribe the Exhibit D and the union</p> <p>12 seniority check-off, membership dues --</p> <p>13 Q. Just read the pages into the record.</p> <p>14 A. Page 2, she can have a copy of page 2 okay. And</p> <p>15 on page 182, accumulating seniority within 90 days,</p> <p>16 within six months, and that goes down to paragraph (4),</p> <p>17 paragraph (4) through (c). Okay.</p> <p>18 Is there anything else? There is two pages</p> <p>19 there so far.</p> <p>20 Okay. Also page 53. Employees will be laid</p> <p>21 off and rehired in accordance with their local seniority</p> <p>22 agreement.</p> <p>23 And also page 196 it says "Scope of</p> <p>24 Program," corporation and union agreement that security</p>	<p style="text-align: right;">Page 139</p> <p>1 I want this to be a record, that it was</p> <p>2 faxed to me from Michael A. Williams, as stated earlier.</p> <p>3 In closing, I would like to reiterate the</p> <p>4 fact that I was never an hourly worker -- I mean, sorry,</p> <p>5 scratch that. I was an hourly worker. I was never a</p> <p>6 temporary, nor terminated, by the documents that I</p> <p>7 presented from the affidavits from Dave Bull, and these</p> <p>8 investigations were done by the Department of Labor.</p> <p>9 And, okay, and their information was presented to the</p> <p>10 Department of Labor for their recommendations and</p> <p>11 terminology of the violations by their legal staff.</p> <p>12 Okay. At this time I would like, in</p> <p>13 closing, that that's what the Department of Labor had</p> <p>14 discovered, and the information that they obtained from</p> <p>15 General Motors, and that's why they ruled, stating that</p> <p>16 there wasn't no discrimination from the basis of the</p> <p>17 information they found.</p> <p>18 But, clearly, the Department of Labor found</p> <p>19 otherwise, because of the information I presented to</p> <p>20 them, providing with evidence.</p> <p>21 Okay. That's in closing, my argument.</p> <p>22 MR. WILLIAMS: I have nothing further.</p> <p>23 A. Now, for the record, I would like to say one</p> <p>24 thing. She asked me a question about the copies. I</p>
<p style="text-align: right;">Page 138</p> <p>1 employment levels. Page 196. I'll mark them off because</p> <p>2 I read through them.</p> <p>3 I wanted to enter in the record that Mr.</p> <p>4 Michael Williams never entered his appearance at the</p> <p>5 District Court, according to Rule 83, 83.5, which</p> <p>6 requires representation for out-of-state persons to be</p> <p>7 representing a person in state.</p> <p>8 Mr. Michael Busenkell was the one who</p> <p>9 entered after Mr. Sanders, which is something that's</p> <p>10 going to be filed through the courts as well.</p> <p>11 These are the rules, civil procedures of the</p> <p>12 United States District Court, State of Delaware. It says</p> <p>13 "Substitution, Withdrawal of Attorney," page 40. It</p> <p>14 says, "Motion and order for admission pro hac," that</p> <p>15 means certificate by counsel to be admitted to pro hac as</p> <p>16 attorney for Rule 83.5, which I checked the records and I</p> <p>17 seen Mr. Busenkell, William Busenkell -- Michael</p> <p>18 Busenkell, attorney on record. I don't see Mr. Michael</p> <p>19 Williams ever being attorney or ever filling out an</p> <p>20 application to proceed as representation for General</p> <p>21 Motors.</p> <p>22 That's in violation of 83.5, which is going</p> <p>23 to be turned into the Attorney General's Office and also</p> <p>24 going to be reviewed.</p>	<p style="text-align: right;">Page 140</p> <p>1 would like to have my original. She can have copies for</p> <p>2 the exhibits. This is my exhibits that I brought in,</p> <p>3 which you failed to bring in or you didn't feel as though</p> <p>4 they were necessary, but to show proof and evidence,</p> <p>5 contrary to what you were saying and what General Motors</p> <p>6 is saying, clearly, these evidence speaks for themselves.</p> <p>7 Would Dave Bull -- he is a rep from General Motors.</p> <p>8 Okay.</p> <p>9 So, again, I'm asking you, I would like to</p> <p>10 have -- she can have a copy of that, and plus a copy of</p> <p>11 my union book for her own records and for the records for</p> <p>12 the state, as far as discovery, by the 8th of November,</p> <p>13 for discovery by the 8th of November, judge's order.</p> <p>14 Now, like I said, these are mine's, these</p> <p>15 are my originals. She can have copies. And also a copy</p> <p>16 of this.</p> <p>17 So she told me to ask you, because I don't</p> <p>18 want her to have my originals. I need these. Those are</p> <p>19 mine, personally. If you want some, you can subpoena</p> <p>20 them and you can get them. Okay. Those are my personal</p> <p>21 records. According to the rules of District Court, I'm</p> <p>22 entitled to my own personal records.</p> <p>23 And I would like to mark exhibit of the</p> <p>24 rules --</p>

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<p style="text-align: right;">Page 141</p> <p>1 Q. Sir, once you said you were done and I concluded, 2 you can't add any other exhibits. 3 A. I understand that, but I just wanted you to 4 answer the question about my records, that she asked me a 5 question earlier, and in opening and closing I asked you 6 a question, I would like to have a copy. 7 If you disagree, I'm going to have to bring 8 out the rules. Okay. These are the rules. I'm going 9 by, like I said earlier, Civil Practice Procedures of the 10 United States District Court, if you want to disagree 11 with that. I'll write a letter to the judge. I have to 12 do what this says. 13 And you know, I talked to you many days 14 about these rules. Now, the rules, if you know the 15 rules, you cite them. You know, these are the rules of 16 the District Court. 17 Q. Sir, what you fail to understand is that when you 18 choose to bring exhibits to a deposition or add exhibits 19 to the deposition, the originals go with the court 20 reporter. To the extent you failed to bring copies, that 21 wasn't my obligation. My obligation was to bring the 22 exhibits that I was going to use. 23 If you would like to ask Mr. Busenkell, 24 since we are in his office, if he will make you a copy,</p>	<p style="text-align: right;">Page 143</p> <p>1 like I have been doing. 2 Q. Sir, the record will reflect what the record 3 reflects. I have neither the time or energy to deal with 4 you about this, and the judge can deal with it however he 5 deems appropriate. 6 Exhibit 1 must go back with the court 7 reporter. 8 A. That goes back with her. Fine. 9 (Anderson Deposition Exhibit 12 was marked 10 for identification.) 11 (Proceedings conclude at 12:19 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 142</p> <p>1 that's one thing. But I have no obligation to make 2 copies of these exhibits or get involved in this. 3 A. If you can state that rule. If you know the 4 rules, state it. If you can state the rules, I'll gladly 5 write a letter to the judge, clarifying what you are 6 saying on teletape. 7 I want to see the rules. Don't look at my 8 rules. I want to see the rules where you say you are not 9 entitled to the exhibits I brought in. I beg to differ, 10 sir. I see something different and you can't even cite 11 the rule. 12 Q. Sir -- 13 A. Sir, I'm just telling you what the rules are. 14 Q. Again, I'm now done with this conversation 15 because -- 16 A. If you can talk to him, I'll be glad to get a 17 copy of my situation here. 18 Q. Again, nothing in the rule requires me to -- 19 A. Sir, can you point that out? Can you point that 20 out? It does say that. Okay. 21 Q. What are you talking about? I have no idea what 22 you are even talking about. 23 A. Ask Mr. Busenkell to get a copy of the books, 24 whatever. I'll make a notation to the judge, whatever,</p>	<p style="text-align: right;">Page 144</p> <p>1 INDEX 2 DEPONENT: ROLAND C. ANDERSON PAGE 3 Examination by Mr. Williams 2 4 5 EXHIBITS 6 7 ANDERSON DEPOSITION EXHIBITS MARKED 8 9 1 10/23/07 Williams to Anderson fax 2 10 2 Complaint in action 05-877 2 11 3 Complaint in action 06-669 2 12 4 9-8-05 EEOC to Anderson letter 43 13 5 Privacy Act Statement 66 14 6 Charge of Discrimination dated 2-14-06 66 15 7 2-22-06 Division of Industrial Affairs 16 letter 66 17 18 8 EEOC Retaliation definition 66 19 20 9 GM Benefits & Services Center cover page 21 dated 10-5-07 66 22 10 Affidavit of David I. Bull 66 23 11 Seniority list 66 24 12 Excerpts of a publication 143 25 26 ERRATA SHEET/DEPONENT'S SIGNATURE PAGE 145 27 CERTIFICATE OF REPORTER PAGE 146 28 29 30</p>

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EX. 1

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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p>Page 145</p> <p>REPLACE THIS PAGE WITH THE ERRATA SHEET AFTER IT HAS BEEN COMPLETED AND SIGNED BY THE DEPONENT.</p>	
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p>Page 146</p> <p>1 State of Delaware) 2) 3 New Castle County) 4 5 CERTIFICATE OF REPORTER 6 I, Eleanor J. Schwandt, Registered 7 Professional Reporter and Notary Public, do hereby 8 certify that there came before me on the 24th day of 9 October, 2007, the deponent herein, ROLAND C. ANDERSON, 10 who was duly sworn by me and thereafter examined by 11 counsel for the respective parties; that the questions 12 asked of said deponent and the answers given were taken 13 down by me in Stenotype notes and thereafter transcribed 14 by use of computer-aided transcription and computer 15 printer under my direction. 16 I further certify that the foregoing is a 17 true and correct transcript of the testimony given at 18 said examination of said witness. 19 I further certify that I am not counsel, 20 attorney, or relative of either party, or otherwise 21 interested in the event of this suit. 22 23 Eleanor J. Schwandt 24 Certification No. 125-RPR (Expires January 31, 2008) DATED: October 24, 2007</p>	

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EX. 1

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